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Attorneys for Defendants, American Airlines, Inc.
File No. 13001-5581

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

SHERYL SIEGEL,

Plaintiff,

vs.

**AMERICAN AIRLINES, INC., MUNICH
AIRPORT US HOLDING, LLC; JOHN
DOES 1-3 (fictitious names); ABC
CORPORATION (a fictitious
corporation) and ABC MAINTENANCE
COMPANY (a fictitious name)**

Defendants.

Civil Case No.

Civil Action

NOTICE OF REMOVAL

**TO: THE HONORABLE JUDGES OF THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Pursuant to 28 U.S.C. §§ 1332, 1441, and 1446, Defendant American Airlines, Inc., hereby timely removes the above-captioned action from the Superior Court of New Jersey, Law Division, Essex County, to the United States District Court for the District of New Jersey. As grounds for removal, American Airlines, Inc., respectfully states as follows:

1. On or about June 23, 2022, American Airlines, Inc. was served with a Summons and Complaint, filed on behalf of the plaintiff, Sheryl Siegel. A copy of the Summons and Complaint is annexed hereto. Said Summons and Complaint is entitled Sheryl Siegel v. American Airlines, Inc., Munich Airport Us Holding, LLC; John Does 1-3 (fictitious names); ABC Corporation (a fictitious corporation) and ABC Maintenance Company (a fictitious name). This lawsuit is venued in the Superior Court of New Jersey, Law Division, Essex County and bears Docket No. ESX-L-3545-22. The service of the Summons and Complaint was the first notice received by American Airlines, Inc. of this lawsuit.

2. At the time this action was commenced, plaintiff was and still is a citizen of the State of New Jersey. Plaintiff resides at 6 Summit Street, Apt. 127, Township of West Orange, County of Essex, State of New Jersey. (See Complaint) Defendant, American Airlines, Inc. was, at the time this action was commenced, and remains a corporation of the State of Delaware with its principle place of business in the State of Texas, and was not and is not a citizen of the State of New Jersey wherein this action was brought.

3. Defendant, Munich Airport Us Holding, LLC is a foreign corporation, incorporated in Delaware.

4. In the Complaint filed in the Superior Court, the plaintiff, Sheryl Siegel alleges that she sustained “serious, permanent and disabling injuries”. Further, the Complaint states that plaintiff “suffered and will continue to suffer great pain and mental anguish, was required and will in the future be required to seek medical care and

attention, was prevented and will in the future be prevented from engaging in her usual pursuits, interest and occupations". (See Complaint, First Count, ¶ 3 and 4)

5. The above described action is a Civil Action of which this Court has original jurisdiction under the provisions of Title 28 United States Code § 1332, and is one which may be removed to this Court by the petitioner, defendant herein, pursuant the provisions of Title 28 United States Code § 1441, in that this is a Civil Action wherein the matter in controversy exceeds the sum or value of \$75,000.00, exclusive of interest and costs, and is between citizens of different states.

WHEREFORE, defendant/petitioner, American Airlines, Inc. pray that the above-entitled action now pending in the Superior Court of New Jersey, Law Division, Essex County, be removed therefore to this Court.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

CHASAN LAMPARELLO MALLON & CAPPUZZO, PC
Attorneys for Defendant, American Airlines, Inc.

By: 
JOHN V. MALLON

DATED: July 18, 2022

LOMURRO, MUNSON, COMER, BROWN & SCHOTTLAND, LLC

Donald M. Lomurro, Esq.
NJ Attorney ID: 16801976
4 Paragon Way, Suite 100
Freehold, New Jersey 07728
(732) 414-0300

Attorney for Plaintiff

SHERYL SIEGEL

Plaintiff,

v.

AMERICAN AIRLINES, INC.;
MUNICH AIRPORT US HOLDING,
LLC; JOHN DOES 1-3 (fictitious
names; ABC CORPORATION (a
fictitious corporation) and
ABC MAINTENANCE COMPANY (a
fictitious name)

Defendants.

SUPERIOR COURT OF NEW JERSEY
ESSEX COUNTY
LAW DIVISION

Docket No: ESX-L-3545-22

Civil Action

SUMMONS

From The State of New Jersey To The Defendant(s) Named Above:

AMERICAN AIRLINES, INC.
c/o Corporation Service Company

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (A directory of the addresses of each deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deputyclerklawref.pdf. If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also

send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$135.00 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deputyclerklawref.pdf.

Michelle M. Smith /s/
Michelle M. Smith, Clerk

Dated: June 17, 2022

Name of defendant to be served: American Airlines, Inc.
Registered Agent: c/o Corporation Service Company

Address of the Defendant to be served:

Princeton South Corporate Center
Suite 160
100 Charles Ewing Blvd.
Ewing, NJ 08628

Note: Adopted July 13, 1994, effective September 1, 1994; amended June 28, 1996, effective September 1, 1996; address/phone information updated July 1, 1999, effective September 1, 1999; amended July 12, 2002 to be effective September 3, 2002; amended July 27, 2006 to be effective September 1, 2006; address/phone information updated October 10, 2006 to be effective immediately; address/phone information updated November 1, 2006 to be effective immediately; address/phone information updated November 17, 2006 to be effective immediately; amended July 23, 2010 to be effective September 1, 2010; amended and Directory of Superior Court Deputy Clerk's Offices, County Lawyer Referral, and Legal Services Offices deleted July 19, 2012 to be effective September 4, 2012.

LOMURRO, MUNSON, COMER, BROWN & SCHOTTLAND, LLC

Donald M. Lomurro, Esq.
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Attorney for Plaintiff

SHERYL SIEGEL

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Defendants.

SUPERIOR COURT OF NEW JERSEY
ESSEX COUNTY
LAW DIVISION

Docket No:

Civil Action

COMPLAINT, JURY DEMAND AND
DESIGNATION OF TRIAL COUNSEL

Plaintiff, Sheryl Siegel, residing at 6 Summit Street, Apt 127, in the Township of West Orange, County of Essex and State of New Jersey, by way of complaint against the defendants, say:

FIRST COUNT

1. On or about April 21, 2021, Plaintiff, Sheryl Siegel, was a lawful guest/invitee upon the premises of Newark Liberty International Airport located at or about the area of Terminal B, within the City of Newark, County of Essex and State of New Jersey.

2. At all times referenced herein, Defendant, American Airlines, Inc., were the owners, managers and/or lessees of the premises, and did negligently, carelessly and recklessly failed

to maintain, manage, operate, inspect and control the premises creating a hazardous and dangerous condition.

3. As a direct and proximate result of the aforesaid careless, reckless and negligent actions and/or inactions of Defendant, American Airlines, Inc., its agents, employees and/or representatives, the Plaintiff, Sheryl Siegel, was caused to fall, thereby sustaining serious, permanent and disabling injuries.

4. As a direct and proximate result of the aforesaid careless, reckless and negligent actions and/or inactions of Defendant, American Airlines, Inc., its agents, representatives and employees, jointly, individually and/or severally, Plaintiff, Sheryl Siegel, suffered and will continue to suffer great pain and mental anguish, was required and will in the future be required to seek medical care and attention, was prevented and will in the future be prevented from engaging in her usual pursuits, interests and occupations.

WHEREFORE, Plaintiff, Sheryl Siegel, demands judgment against the Defendant, American Airlines, Inc., its agents, employees and/or representatives, jointly, individually and severally, for damages, together with interest, cost of suit

and such other damages as the Court deems just and appropriate.

SECOND COUNT

1. Plaintiff repeats each and every allegation contained in the First Count of the Complaint as if more fully set forth herein.

2. At all times referenced herein, Defendant, Munich Airport US Holding, LLC, were the owners, managers and/or lessees of the premises, and did negligently, carelessly and recklessly failed to maintain, manage, operate, inspect and control the premises creating a hazardous and dangerous condition.

3. As a direct and proximate result of the aforesaid negligent, careless and reckless actions and/or inactions of the Defendant, Munich Airport US Holding, LLC, its agents, employees and/or representatives, the Plaintiff, Sheryl Siegel, was caused to fall, thereby sustaining serious, permanent and disabling injuries.

4. As a direct and proximate result of the aforesaid careless, reckless and negligent actions and/or inactions of Defendant, Munich Airport US Holding, LLC, its agents, representatives and employees, jointly, individually and/or severally, Plaintiff, Sheryl Siegel, suffered and will continue to suffer great pain and mental anguish, was

required and will in the future be required to seek medical care and attention, was prevented and will in the future be prevented from engaging in her usual pursuits, interests and occupations.

WHEREFORE, Plaintiff, Sheryl Siegel, demands judgment against the Defendant, Munich Airport US Holding, LLC, its agents, employees and/or representatives, jointly, individually and severally, for damages, together with interest, cost of suit and such other damages as the Court deems just and appropriate.

THIRD COUNT

1. Plaintiff repeats each and every allegation contained in the First and Second Counts of the Complaint as if more fully set forth herein.

2. At all times referenced herein, Defendant, John Does 1-3, (fictitious name); ABC Corporation (a fictitious corporation) and ABC Maintenance Company (a fictitious name), were the owners, managers and/or lessees of the premises, and did negligently, carelessly and recklessly failed to maintain, manage, operate, inspect and control the premises creating a hazardous and dangerous condition.

3. As a direct and proximate result of the aforesaid negligent, careless and reckless actions and/or inactions

of the Defendant, John Does 1-3, (fictitious name); ABC Corporation (a fictitious corporation) and ABC Maintenance Company (a fictitious name), its agents, employees and/or representatives, the Plaintiff, Sheryl Siegel, was caused to fall, thereby sustaining serious, permanent and disabling injuries.

4. As a direct and proximate result of the aforesaid careless, reckless and negligent actions and/or inactions of Defendant, John Does 1-3, (fictitious name); ABC Corporation (a fictitious corporation) and ABC Maintenance Company (a fictitious name), its agents, representatives and employees, jointly, individually and/or severally, Plaintiff, Sheryl Siegel, suffered and will continue to suffer great pain and mental anguish, was required and will in the future be required to seek medical care and attention, was prevented and will in the future be prevented from engaging in her usual pursuits, interests and occupations.

WHEREFORE, Plaintiff, Sheryl Siegel, demands judgment against the Defendant, John Does 1-3, (fictitious name); ABC Corporation (a fictitious corporation) and ABC Maintenance Company (a fictitious name), its agents, employees and/or representatives, jointly, individually and severally, for

damages, together with interest, cost of suit and such other damages as the Court deems just and appropriate.

DEMAND FOR TRIAL BY JURY

Plaintiff hereby demands a trial by jury as to all issues.

TRIAL COUNSEL DESIGNATION

Please take notice that pursuant to the provisions of Rule 4:25-4, DONALD M. LOMURRO, ESQUIRE is hereby designated as trial counsel on behalf of the plaintiffs.

NOTICE OF OTHER ACTIONS

We hereby certify pursuant to Rule 4:5-2 that this matter is not the subject of any other civil action pending in any Court or of a pending arbitration proceeding, and that there exist no other known parties at this time to be joined to this action.



DONALD M. LOMURRO

Dated: June 16, 2022